

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ALI AL-TIMIMI,

Defendant.

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CRIMINAL NO. 1:04-cr-385

Government's Reply in Further Support of Motion for a Stay

The defendant has now filed his opposition to the government's stay motion. (ECF No. 530.) As to the substance of the parties' dispute, the Court is well aware of the various issues and the government relies on its brief in favor of a stay. (ECF No. 525.)

The government writes only to update the Court as to the status of matters at the Fourth Circuit. The Circuit entered a memorandum briefing order on August 26, 2020, and the government filed its opening brief and a joint appendix that same day. (No. 20-4441, ECF Nos. 3, 5–6.) The Circuit has now accelerated the briefing schedule even further such that the defendant's response brief is due on Monday, August 31, at noon, and any reply from the government is due the day after the defendant's anticipated release—*i.e.*, on September 2. (No. 20-4441, ECF No. 14.)

Given this extremely rapid briefing schedule, the parties and the Court should know the final resolution of this matter quickly. That acceleration counsels in favor of a stay.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By: _____ /s/

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Certificate of Service

I certify that on August 28, 2020, I electronically filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

By: _____ /s/

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